

## **INTRODUCTION**

Welcome to the The BucketLust LTD's privacy notice.

The BucketLust respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a structured format so you can clearly see the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

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## **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how The BucketLust collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service, or attend one of our events.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **CONTROLLER**

The BucketLust LTD is the controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests, please contact the DPO using the details set out below.

## CONTACT DETAILS

Our full details are:

Full name of legal entity: The BucketLust LTD

Email address: [hq@thebucketlust.org](mailto:hq@thebucketlust.org)

Postal address: 10 London Mews, Paddington, London W2 1HY

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 24 May 2018 and historic versions are archived here can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, nationality, title, date of birth, gender, passport number, clothing and shoe size.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data

may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - **Technical Data** from the following parties:
    - (a) analytics providers such as Google based outside the EU;
    - (b) advertising networks based outside the EU; and
    - (c) search information providers based outside the EU.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services inside or outside the EU.
  - Identity and Contact Data from data brokers or aggregators based inside or outside the EU.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

If you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| <b>Purpose/Activity</b>  | <b>Type of data</b>  | <b>Lawful basis for processing including basis of legitimate interest</b>   |
|--|--|---|
| <p>To register you as a new customer, including:</p> <p>(a) Enable you to make bookings, fulfil, provide, perform, administer, manage, and enforce all bookings, orders, and other contracts which relate to you</p>   | <p>(a) Identity<br/>(b) Contact</p>  | <p>Performance of a contract with you</p>   |
| <p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) Respond &amp; administer enquiries and provide information</p> | <p>(a) Identity<br/>(b) Contact<br/>(c) Financial<br/>(d) Transaction<br/>(e) Marketing and Communications</p> | <p>(a) Performance of a contract with you<br/>(b) Necessary for our legitimate interests (to recover debts due to us)</p>   |
| <p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>                          | <p>(a) Identity<br/>(b) Contact<br/>(c) Profile<br/>(d) Marketing and Communications</p>                       | <p>(a) Performance of a contract with you<br/>(b) Necessary to comply with a legal obligation<br/>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p> |
| <p>(c) Provide information about our Website, systems and services as well</p>   | <p>(a) Identity</p>  | <p>(a) Performance of a contract with you</p>   |

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|--|---|--|
| <p>as general updates</p> <p>(d) Internal record keeping and maintenance of reasonable archives concerning enquiries, bookings, contracts, services and complaints</p> <p>(e) To enable you to partake in a prize draw, competition or complete a survey</p> | <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>  | <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>  |
| <p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>   | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>   | <p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p> |
| <p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>  | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p> | <p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>   |
| <p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>  | <p>(a) Technical</p> <p>(b) Usage</p>   | <p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>   |
| <p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>   | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>   | <p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>   |

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In addition to the above, we may also use your personal data for the following purposes, including: (a) helping us identify you and any accounts you hold with us; (b) enable your use of the services on our Website; (c) supply to you services/goods purchased through our Website; (d) send you email notifications/newsletters that you have specifically requested; (e) send you non-marketing commercial communications; and (f) fraud prevention and detection.

## **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Where your consent has been provided in advance, in addition to providing you with information on our (including our group companies) offers, forthcoming events, new routes/products etc., we may also allow selected third parties to use your data to enable them to provide you with information regarding unrelated goods and services that we believe may be of interest to you. Where you have provided such consent you may withdraw such consent and opt out of any marketing services at any time.

## **PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

From time to time, we may disclose your contact details (i.e. your name, email address, postal address, telephone number, mobile number, fax number and preferences) to: (a) other companies within our Group; and (b) other companies which offer services that may enhance your experience or be able to help you to finalise your arrangements ('third parties'). Such third parties may then contact you directly with marketing information about services and products offered by them, third parties will only contact you in the manner you agreed to (e.g. email, text) when providing your consent.

## **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any company outside the Company for marketing purposes.

## **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by [Contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to

how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties
- External Third Parties
- Specific third parties listed in the table in *paragraph 4* above.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

We (and any affiliate, subcontractor or other person processing your personal data on our behalf) may share your personal data within the Company anywhere within the European Economic Area (EEA).

In operating our website and providing our services to you, it may become necessary to transfer data that we collect from you to locations outside of the EEA for processing and/or storing. By providing your personal data to us you agree to this transfer, processing and/or storing. Whenever we transfer your personal data out of the EEA, we shall use reasonable endeavours to ensure that all reasonable steps are taken to store your data securely. We will only send your personal data outside the EEA to companies either within our group or to parties with whom we have a contract.

Please [Contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please [Contact us](#).